



*Consulting Engineers
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February 10, 2006
(PBW Project No. 1259)

VIA ELECTRONIC MAIL AND OVERNIGHT DELIVERY

Mr. Gary Miller
Superfund Division, Region 6 (6SF-AP)
Arkansas/Texas Section
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Ms. Barbara Nann
Assistant Regional Counsel
Superfund Division, Region 6 (6RC-S)
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: Extension Request – Final Remedial Investigation/Feasibility Study Work Plan and
Sampling and Analysis Plan Submittal, Gulfco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller and Ms. Nann:

On behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow) (collectively referred to as Respondents in the modified Unilateral Administrative Order (UAO) for the above-referenced Site), Pastor, Behling & Wheeler, LLC (PBW) hereby requests an extension to the time period for submittal of the Final Remedial Investigation/Feasibility Study (RI/FS) Work Plan and the Final Sampling and Analysis Plan (SAP) for the Gulfco site. Paragraph 18 of the Statement of Work (SOW) attached to the UAO requires that the Final RI/FS Work Plan be submitted to EPA within twenty calendar days after receipt of EPA's comments on the Draft Work Plan. Paragraph 26 of the SOW requires that the Final SAP also be submitted to EPA within twenty calendar days after receipt of EPA's comments on the Draft SAP. EPA's comments on the Draft RI/FS Work Plan and the Draft SAP were received on January 24, 2006. Thus, the Final RI/FS Work Plan and Final SAP are due to EPA by February 13, 2006.

As you know, draft responses to the RI/FS Work Plan and SAP comments were prepared and discussed with EPA, TCEQ and natural resource trustee representatives in a meeting on February 8, 2006. The goal of that meeting was to work through the comments and responses such that all comments could be resolved prior to submittal of the Final RI/FS Work Plan and Final SAP, thereby avoiding the possibility that the Final RI/FS Work Plan and/or the Final SAP

would need to be resubmitted at some future date. We believe significant progress toward that goal was achieved in the meeting and all but a handful of issues have been resolved. We are in the process of revising the RI/FS Work Plan and SAP based on those comments that have been resolved, and we will initiate revisions associated with the few outstanding issues identified in the meeting once we hear back from you regarding these issues. As discussed in the meeting, we respectfully request an extension of thirty calendar days to the required timeframes for submittal of the Final RI/FS Work Plan and the Final SAP, so that all comments can be resolved and addressed. With this requested extension, the final plans will be due to EPA on March 15, 2006.

Thank you for your consideration of this request. We eagerly await your response to the few outstanding issues from the February 8, 2006 meeting. Should you have any questions on this extension request or any of the issues discussed at the meeting, please do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC

A handwritten signature in black ink, appearing to read 'Eric F. Pastor', with a long horizontal flourish extending to the right.

Eric F. Pastor, P.E.
Principal Engineer

cc (via electronic mail):

Ms. Luda Voskov - TCEQ
Mr. Brent Murray - Sequa Corporation
Mr. Rob Rouse - The Dow Chemical Company
Mr. Allen Daniels - LDL Coastal Limited, LP
Mr. F. William Mahley - Strasburger & Price, LLP
Mr. James C. Morris III - Thompson & Knight, LLP
Ms. Elizabeth Webb - Thompson & Knight, LLP